

MAY 16 2014

Mr. Juan Somoano  
Glenn Springs Holdings, Incorporated  
5005 LBJ Freeway  
Dallas, Texas 75244

RE: Phase II On-Site Groundwater Investigation RFI Summary Report  
Occidental Chemical Corporation, 6200 S. Ridge Road, Wichita, Kansas  
RCRA ID #KSD007482029

Dear Mr. Somoano:

The U.S. Environmental Protection Agency has reviewed the above referenced document for the Occidental Chemical Corporation Wichita facility, which was received on February 26, 2014. The EPA provides comments below.

First a general comment on the report: This report discusses a considerable amount of data collected for this site, but Occidental must attempt to associate each indication of contamination with a particular release (or general release scenario) making sure that release is characterized to the extent practical, even if the release is not thought to be from a particular AOC/SWMU. In multiple cases, sample results above Occidental's calculated background concentrations received no further discussion, except for clarifying that the SWMU didn't handle waste of that type.

1. Section 2.5: The conceptual site model discusses the hydrogeologic setting, but does not discuss the chemical release scenario in terms of the nature, locations, and magnitudes of releases, or the fate and transport of contamination. A conceptual site model should also discuss exposure scenarios with respect to current and future land use. Please provide a discussion on these aspects of the conceptual site model.
2. Section 4.3: As Occidental has now studied the DNAPL occurrence at this site. To the extent possible, estimate the mass of DNAPL, as well as other forms of contamination, present.
3. Figure 24. This figure focuses on AOC and SWMU evaluations and is useful. Another important output from the RFI should be a description and corresponding diagram of releases that either correspond with AOCs/SWMUs or are independent. Such discussion/figure should accompany and complement the conceptual site model.
4. Section 5.2.1.6: This discussion concludes that in the Penta Accumulation Storage Area, even though multiple compounds were detected in soil borings above Occidental's calculated background concentrations, only the detection of pentachlorophenol causes Occidental to retain this SWMU for further study. It is also necessary to discern from where the 2,4 dichlorophenol, benzene, and alpha-BHC, which were also detected in soil samples proximate to this SWMU, were released including, to the extent possible, location and volume of release(s).

AWMD/WRAP/KNRP/BR:bft:05/14/14:H:AWMD/WRAP/Cores14/Roberts:OCC-PIIOnSiteGWR

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Roberts

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Johnson

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5. Section 5.2.2.5: As with a number of other SWMUs discussed in this report, Sump 446 is listed as having "no indication of a release" even though hexachlorobenzene concentrations in the associated soil sample were above Occidental's calculated background concentrations for the area. As mentioned elsewhere in this letter, it will be important for Occidental to integrate the presence of the identified contamination into the conceptual site model to develop a clear description of the contamination scenario of this site, so that proposed remedies in the future corrective measures study are focused, to the extent possible, not on SWMUs retained for further study, but on identified releases of contamination.
6. Section 5.2.2.7: For the detections over Occidental's calculated background concentrations in non-AOC/SWMU areas, the report states the identified contamination will be subject to further evaluation in the CMS. The report does not indicate what kind of further evaluation will be performed, but it seems the referenced evaluation should be completed in the RFI stage, so that the nature and extent is fully defined prior to entering the CMS stage.
7. Table 8: For former Interceptor Wells 26, 32(old), 33, 34, 35 and Interceptor Wells 30, 31, & 32 (new) it is not clear whether there is an indication of a release since the last column of the table is blank (if no soil samples were collected, provide a footnote to the table). Please provide clarification in the table.

Please make revisions to the report based on the comments above and provide a revised copy within 30 days of receipt of this letter. If you have questions about this letter you may reach me by phone at (913) 551-7279 or by email at [Roberts.Bradley@epa.gov](mailto:Roberts.Bradley@epa.gov).

Sincerely,

Brad Roberts  
Environmental Scientist  
Waste Remediation and Permitting Branch  
Air and Waste Management Division

cc: Lisa Thurman, Occidental Chemicals  
Everett Spellman, KDHE-BWM  
Bruce Clegg, CRA World



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7

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Lenexa, Kansas 66219

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